

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Joint Stock Company "Channel One Russia
Worldwide," Closed Joint Stock Company
"CTC Network," Closed Joint Stock
Company "TV DARIAL," Closed Joint
Stock Company "New Channel," Limited
Liability Company "Rain TV-Channel,"
Limited Liability Company "Veriselintel,"
Open Joint Stock Company "ACCEPT," and
Limited Liability Company "Comedy TV,"

Plaintiffs,

-against-

INFOMIR, LLC (www.infomirusa.com),
PANORAMA TV (www.mypanorama.tv),
GOODZONE TV (www.gudzon.tv),
MATVIL CORPORATION d/b/a eTVnet
(www.etvnet.com), MIKHAIL GAYSTER,
ACTAVA TV, INC. (www.actava.tv),
MASTER CALL COMMUNICATIONS,
INC., MASTER CALL CORPORATION,
ROUSLAN TSOUTIEV, and JOHN DOES
1-50

Defendants.

Civil Action No. 1:16-cv-01318
(GBD)(BCM)

**NOTICE OF MOTION TO DISMISS
PLAINTIFFS' COMPLAINT AS IT
PERTAINS TO DEFENDANT
INFOMIR, LLC, FOR FAILURE TO
STATE A CLAIM PURSUANT TO
F.R.C.P. 12(b)(6)**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that in accordance with a schedule to be determined by the Court, Defendant, Infomir, LLC, by and through its attorneys, Berkowitz, Lichtstein, Kuritsky, Giasullo & Gross, LLC, will move before the United States District Court for the Southern District of New York, 500 Pearl Street, Court Room 11A, New York, New York before the Honorable George B. Daniels, U.S.D.J., for an Order dismissing Plaintiffs' complaint as it pertains to Defendant, Infomir, LLC, for failure to state a claim upon which relief may be granted pursuant to Federal Rule of Civil Procedure 12(b)(6).

PLEASE TAKE FURTHER NOTICE, that in support of the motion, Defendant shall rely upon the attached Brief submitted herewith, and all of the papers and pleadings heretofore filed in this action.

PLEASE TAKE FURTHER NOTICE, that pursuant to Local Rule 6.1(c), Defendant respectfully requests oral argument, if this motion is opposed.

BERKOWITZ, LICHTSTEIN,
KURITSKY, GIASULLO & GROSS, L.L.C.
Attorneys for Defendant
Infomir, LLC

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Dated: May 31, 2016